

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-vs-

CASSANDRA N. DEHN,

Defendant.

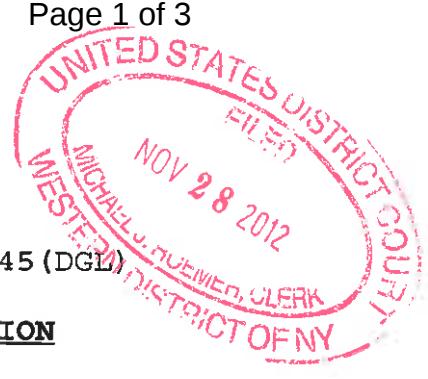
12-CR-6145 (DGL)

INFORMATION

(Felony)

Violation:

18 U.S.C. § 1349



COUNT 1

**The United States Attorney Charges:**

1. Beginning on or about July 1, 2009, and continuing through on or about August 1, 2009, in the Western District of New York and elsewhere, the defendant, CASSANDRA DEHN, did knowingly, willfully and unlawfully combine, conspire and agree with David Pierleoni, and others, known and unknown, to devise and intend to devise, a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent representations by transmitting and causing to be transmitted writings, signs and signals by wire communication in interstate and foreign commerce to execute the scheme and artifice to defraud and to obtain money and property, in violation of Title 18, United States Code, Section 1343.

2. At all times relevant to this Information, the defendant, CASSANDRA N. DEHN, was employed as a front desk employee at the Comfort Inn and Suites in Willard, Missouri. As an employee of the hotel, the defendant, CASSANDRA N. DEHN, had access to the personal

information of Comfort Inn and Suites guests, including their credit card account numbers, expiration dates and access codes.

3. As part of the conspiracy, the defendant, CASSANDRA N. DEHN, knowingly obtained credit card numbers, expiration dates and access codes belonging to Comfort Inn and Suites guests, from a computer terminal in Willard, Missouri, and intentionally transmitted the information via wire and electronic communication, including by electronic mail ("e-mail") and MySpace.com messages, to co-defendant David M. Pierleoni, in the Western District of New York.

4. In furtherance of the conspiracy, co-defendants David M. Pierleoni and Victor M. Ortiz, utilized the credit card account numbers, expiration dates and access codes that the defendant, CASSANDRA N. DEHN, transmitted by wire and electronic communication, by falsely and fraudulently representing that they were the account holders of the particular credit card account numbers and in order to make unauthorized purchases of liquor, food and other services.

5. In return for electronically transmitting the credit card account numbers, expiration dates and access codes belonging to Comfort Inn and Suites guests to co-defendant David M. Pierleoni,

the defendant, CASSANDRA N. DEHN, received a cash payment from David M. Pierleoni.

All in violation of Title 18, United States Code, Section 1349.

DATED: Rochester, New York, November 28, 2012.

WILLIAM J. HOCHUL, JR.  
United States Attorney

BY:



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